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7  
 8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

9 B DIAMOND INFRA LLC,

10 Plaintiff,

11 v.

12 CARMEN FERCH, AS TRUSTEE OF  
 13 THE CARMEN FERCH TRUST, and the  
 14 FEDERAL AVIATION  
 ADMINISTRATION,

15 Defendants.

Case No. 3:22-cv-00443-LRH-CSD

**Stipulation to Extend the United States'  
 Deadline to Answer**

**(Fourth Request)**

16 Pursuant to Local Rule IA 6-1, the parties stipulate and request that Defendants  
 17 shall have a 30-day extension of time to file an answer or otherwise respond to Plaintiff's  
 18 Complaint (ECF No. 1). The current deadline to answer is **April 10, 2023**. This is the  
 19 Parties' fourth request for extension.

20 This matter involves a complex real property issue connected to an easement and a  
 21 lease held by the Federal Aviation Administration for critical aviation communications  
 22 infrastructure. The parties have worked diligently to verify important facts, discuss this  
 23 matter with interested parties, and determine whether they can resolve this matter without  
 24 litigation. They have circulated a draft stipulation that will resolve this matter which is  
 25 being considered by the various parties.

26 One component of the resolution is a proposed negotiated lease between the Federal  
 27 Aviation Administration (FAA) and B Diamond Infra. B Diamond has proposed lease  
 28

terms which are being considered by the FAA and the parties are negotiating a draft lease.  
The parties continue to negotiate in good faith.

The parties agree that a 30-day extension of the answer deadline is appropriate under the circumstances. This stipulation is filed in good faith and not for the purpose of delay.

WHEREFORE, the parties respectfully requests that this stipulation be granted and that the deadline to respond to the complaint be extended through and including **May 10, 2023**.

Respectfully submitted this 7th day of April 2023.

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*Attorney for Defendant Carmen Ferch as  
Trustee of the Carmen Ferch Trust*

IT IS SO ORDERED:

  
UNITED STATES MAGISTRATE JUDGE

DATED: April 10, 2023